

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: §
FIELDWOOD ENERGY LLC, *et al.*, § Case No. 20-33948 (MI)
DEBTORS. § CHAPTER 11
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**NOTICE OF CONTINUATION AND PERFECTION OF LIENS AND PRIVILEGES IN
CERTAIN PROPERTY OF THE DEBTORS' ESTATES
PURSUANT TO 11 U.S.C. § 546(b)**

Warrior Energy Services Corporation (“*Warrior*”), appearing herein through undersigned counsel, hereby provides written notice pursuant to 11 U.S.C. § 546(b) of the continuation and perfection of interests in certain property of the estates of the Debtors Fieldwood Energy, LLC, et al.¹ (together, the “*Debtors*”), and in the proceeds, products, offspring, rents, or profits of such property, and in support thereof, respectfully represents:

1. Prior to the filing of voluntary chapter 11 petitions by the Debtors on August 3, 2020 and August 4, 2020, Warrior provided rental equipment, goods, and associated services to the Debtors in support of the Debtors’ digging, drilling, torpedoing, operating, completing, maintaining, and/or repairing oil and/or gas wells in connection with the oil and gas leases listed on the following page (collectively, the “*Oil & Gas Properties*”):

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Holdings LLC (9264); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

a. EUGENE ISLAND-125

Lease#: OCS-G-00051
Area/Block: EI-124
Adjacent Parish: ST. MARY/TERREBONNE

b. SOUTH MARSH ISLAND-149

Lease #: OCS-G-02592
Area/Block: SMI-149
Adjacent Parish: IBERIA/VERMILION

c. EUGENE ISLAND-345

Lease #: OCS-G-21647
Area/Block: EI-345
Adjacent Parish: ST. MARY/TERREBONNE

d. SOUTH TIMBALIER-53

Lease#: OCS-G-04000
Area/Block: ST-53
Adjacent Parish: TERREBONNE

e. WEST CAMERON-290

Lease#: OCS-G-04818
Area/Block: WC-290
Adjacent Parish: CAMERON

f. WEST DELTA-80

Lease#: OCS-G-01449
Area/Block: WD-80
Adjacent Parish: PLAQUEMINES

g. SOUTH TIMBALIER-242

Lease#: OCS-G-23933
Area/Block: ST-242
Adjacent Parish: TERREBONNE

h. MAIN PASS-153

Lease#: OCS-G-01967

Area/Block: MP-153
Adjacent Parish: PLAQUEMINES

i. SOUTH PASS-62

Lease#: OCS-G-01294
Area/Block: SP 62
Adjacent Parish: PLAQUEMINES

j. SOUTH MARSH ISLAND-150

Lease#: OCS-G-16325
Area/Block: SM 150
Adjacent Parish: IBERIA/VERMILION

k. EUGENE ISLAND-337

Lease#: OCS-G-03332
Area/Block: EI-337
Adjacent Parish: ST. MARY PARISH/IBERIA/TERREBONNE

l. MAIN PASS-77

Lease#: OCS-G-04481
Area/Block: MP 77
Adjacent Parish: PLAQUEMINES

m. SOUTH TIMBALIER-195

Lease#: OCS-G-03593
Area/Block: ST-195
Adjacent Parish: TERREBONNE

n. HIGH ISLAND-382

Lease#: OCS-G-02757
Area/Block: HI-382
Adjacent County: GALVESTON

o. HIGH ISLAND-573

Lease#: OCS-G-02393
Area/Block: HI-572
Adjacent County: GALVESTON

p. SL-14519-MYETTE POINT

Lease#:	SL-14519
Field ID#:	6985
Area/Block:	Myette Point
Adjacent Parish:	ST. MARY

q. SL-14914-MYETTE POINT

Lease#:	SL-14914
Field ID#:	6985
Area/Block:	Myette Point
Adjacent Parish:	ST. MARY

2. Pursuant to the Louisiana Oil Well Lien Act, La. R.S. § 9:4861, *et seq.*, Warrior timely preserved and perfected its liens and privileges over each of the Oil & Gas Properties, including but not limited to, the wells, buildings, pipelines, constructions, and other facilities thereon, by filing the lien affidavits attached hereto in Exhibits 1-5 (collectively, the “*Warrior Lien Affidavits*”):

a. EUGENE ISLAND 125:

- i. Recorded in St. Mary Parish, State of Louisiana (09/08/2020): File No. 352526, Book 1601, Folio 286. Attached hereto as **Exhibit 1**.
- ii. Recorded in Terrebonne Parish, State of Louisiana (09/08/2020): File No. 1610015, Book 3178, Folio 756. Attached hereto as **Exhibit 2**.

b. SOUTH MARSH ISLAND 149:

- i. Recorded in Iberia Parish, State of Louisiana (09/08/2020): File No. 2020-00007400, Book 1919, Folio 103. Attached hereto as **Exhibit 3**.
- ii. Recorded in Vermilion Parish, State of Louisiana (9/08/2020): File No. 2020-0006218. Attached hereto as **Exhibit 4**.

c. EUGENE ISLAND-345:

- i. Recorded in Terrebonne Parish, State of Louisiana (10/02/2020): File No. 1611877, Book 3186, Folio 389. Attached hereto as **Exhibit 5**.

- ii. Recorded in Terrebonne, State of Louisiana (10/02/2020): File No. 352782, Book 1603, Folio 424. Attached hereto as **Exhibit 6**.
- d. **SOUTH TIMBALIER 53**: Recorded in Terrebonne, State of Louisiana (09/08/2020): File# 1610017, Book 3178, Folio 779. Attached hereto as **Exhibit 7**.
- e. **WEST CAMERON 290**: Recorded in Cameron Parish (09/30/2020): File# 348101. Attached hereto as **Exhibit 8**.
- f. **WEST DELTA 80**: Recorded in Plaquemines Parish (08/08/2020): File# 2020-00003660, Book 776, Folio 253. Attached hereto as **Exhibit 9**.
- g. **SOUTH TIMBALIER 242**: Recorded in Terrebonne Parish (10/02/2020): File# 1611876, Book 3186, Folio 383. Attached hereto as **Exhibit 10**.
- h. **MAIN PASS 153**: Recorded in Plaquemines Parish (09/21/2020): File# 2020-00003843, Book 777, Folio 347. Attached hereto as **Exhibit 11**.
- i. **SOUTH PASS-62**: Recorded in Plaquemines Parish (09/11/2020): File# 2020-00003762, Book 776, Folio 602. Attached hereto as **Exhibit 12**.
- j. **SOUTH MARSH ISLAND-150**:
 - i. Recorded in Iberia Parish (09/08/2020): File# 2020-00007399, Book 1919, Folio 89. Attached hereto as **Exhibit 13**.
 - ii. Recorded in Vermilion Parish (09/08/2020): File# 2020-0006217. Attached hereto as **Exhibit 14**.
- k. **EUGENE ISLAND 337**:
 - i. Recorded in Terrebonne Parish (09/08/2020): File# 1610016, Book 3178, Folio 764. Attached hereto as **Exhibit 15**.
 - ii. Recorded in St. Mary Parish (09/08/2020): File# 352527, Book 1601, Folio 294. Attached hereto as **Exhibit 16**.
 - iii. Recorded in Iberia Parish (09/08/2020): File# 2020-00007398, Book 1919, Folio 74. Attached hereto as **Exhibit 17**.
- l. **MAIN PASS 77**: Recorded in Plaquemines Parish (09/11/2020): File# 2020-00003727, Book 776, Folio 617. Attached hereto as **Exhibit 18**.

- m. **SOUTH TIMBALIER-195:** Recorded in Terrebonne Parish (09/11/2020): File# 1610394, Book 3180, Folio 280. Attached hereto as **Exhibit 19**.
- n. **HIGH ISLAND-382:** Recorded in Galveston County (10/13/2020): Instrument# 2020-065383. Attached hereto as **Exhibit 20**.
- o. **HIGH ISLAND-573:** Recorded in Galveston County (09/17/2020): Instrument# 2020-58229. Attached hereto as **Exhibit 21**.
- p. **SL-14519 (MAYETTE POINT-FIELD ID-6985):** Recorded in St. Mary Parish (09/11/2020): File# 352583, Book 1601, Folio 671. Attached hereto as **Exhibit 22**.
- q. **SL-14914 (MAYETTE POINT-FIELD ID-6985):** Recorded in St. Mary Parish (09/08/2020): File# 352528, Book 1601, Folio 309. Attached hereto as **Exhibit 23**.

3. In accordance with 11 U.S.C. § 546(b)(1), Warrior hereby perfects, maintains or continues the perfection of and provides notice of intention to enforce its liens and privileges (the “**546 Interests**”) in the Oil & Gas Properties, together with such other property described in the Warrior Lien Affidavits and set forth in La. R.S. § 9:4861(12)(c) (collectively with the Oil & Gas Properties, the “**Encumbered Properties**”), and provides notice of its intention to enforce such liens and privileges with respect to such Encumbered Properties. The 546 Interests perfected, maintained, and/or continued hereby extend in and to the proceeds, products, offspring, rents, or profits of such Encumbered Properties.

4. Warrior further provides notice that it objects and does not consent to (a) any effort to prime its perfected 546 Interests against the Encumbered Properties or any other property of Debtors’ estates; and (b) any use of cash collateral that is the proceeds of hydrocarbons produced from the Encumbered Properties.

5. Warrior reserves the right to request relief from the automatic stay of 11 U.S.C. § 362, or any other appropriate relief, to enforce and defend its perfected 546 Interests against the Encumbered Properties or any other property of the Debtors' estates.

6. This Notice shall not be deemed an admission that any filing is necessary to perfect or maintain perfection of the 546 Interests under the Bankruptcy Code, the Louisiana Revised Statutes, or any other applicable law.

7. Warrior reserves the right to supplement or amend this Notice, including the amounts owed and to itemize any further attorneys' fees, costs, interest, or other amounts recoverable under applicable law.

8. Warrior files this Notice without limitation or waiver of any rights, claims, and defenses against Debtors, their bankruptcy estates, and any third parties.

Respectfully Submitted,

LUGENBUHL, WHEATON, PECK,
RANKIN & HUBBARD

/s/ Benjamin W. Kadden
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Counsel for Warrior Energy Services Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a true and correct copy of the above and foregoing *Notice of Continuation and Perfection of Liens and Privileges in Certain Property of the Debtors' Estates Pursuant to 11 U.S.C § 546(b)* via Notice of Electronic Filing on this 11th day of November 2020.

/s/ Benjamin W. Kadden